

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY ZARA, Plaintiff,)
)
v.) Case No. 16-cv-5156
)
DEVRY EDUCATION GROUP, INC.;) Judge Andrea R. Wood
DEVRY MEDICAL INTERNATIONAL, INC.;)
ROSS UNIVERSITY SCHOOL OF MEDICINE,)
SCHOOL OF VETERINARY MEDICINE (ST. KITTS) LTD.;)
and ALEXA FERRARI, Defendants.)

**DEFENDANT ALEXA FERRARI'S MOTION TO JOIN
IN THE DEVRY AND ROSS UNIVERSITY DEFENDANTS'
MOTION TO DISMISS FOR FORUM NON CONVENIENS**

Defendant Alexa Ferrari ("Ferrari"), by her attorneys, requests the Court to enter an Order granting her leave to join in defendants DeVry Education Group, Inc.'s, DeVry Medical International, Inc.'s, and Ross University School of Medicine, School of Veterinary Medicine (St. Kitts) Ltd.'s Motion to Dismiss for *Forum Non Conveniens*. In support of this motion, Ferrari states as follows:

1. On June 8, 2016, the DeVry and Ross University defendants filed a motion to dismiss and supporting papers, in part based on *forum non conveniens*. (Rs. 20-22).
2. Also on June 8th, Ferrari filed her Rule 12(b)(2) motion to dismiss plaintiffs' claims for lack of personal jurisdiction and supporting papers. (Rs. 17-19).

3. Ferrari also seeks to join in the DeVry and Ross University defendants' motion to dismiss for *forum non conveniens*. Specifically, Ferrari seeks to join in the following argument sections of co-defendants' memorandum of law (R. 21):

- a. Section I(C) (p. 7);
- b. Section II(C) (pp. 10-13); and
- c. The *forum non conveniens* aspects of section III (p. 15).

4. Allowing Ferrari to join in co-defendants' *forum non conveniens* motion will promote judicial economy and the convenience of the parties.

WHEREFORE, Ferrari requests the Court to enter an Order granting her leave to join in the DeVry and Ross University defendants' Motion to Dismiss for *Forum Non Conveniens*, and granting her any other appropriate relief.

DATE: June 8, 2016

Respectfully submitted,

Scott A. Schaefers
BROTSCHUL POTTS LLC
30 N. LaSalle St., Ste. 1402
Chicago, IL 60602
Phone: (312) 268-6795
Email: sschaefers@brotshulpotts.com

ALEXA FERRARI, Defendant.
By: /s/ Scott A. Schaefers
Scott A. Schaefers, one of her attorneys

CERTIFICATE OF SERVICE

Scott A. Schaefers, an attorney for defendant Alexa Ferrari, certifies that on **June 8, 2016**, he served a copy of her **Motion to Join in the DeVry and Ross University Defendants' Motion to Dismiss for Forum Non Conveniens** on the parties' counsel of record via the Court's CM/ECF system.

/s/ Scott A. Schaefers

Scott A. Schaefers